

EXHIBIT

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**THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Civil Action No. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR ADMISSIONS,
INC.,

Plaintiff,

v.

UNIVERSITY OF NORTH CAROLINA,
et al.,

Defendants,

and

LUIS ACOSTA; CHRISTOPHER
JACKSON on behalf of C.J.; RAMONIA
JONES on behalf of R.J.; JULIA NIEVES on
behalf of I.N.; ANGIE & KEVIN MILLS on
behalf of Q.M.; LAURA ORNELAS;
CECILIA POLANCO; TAMIKA
WILLIAMS on behalf of A.J.; and STAR
WINGATE-BEY,

Defendant-Intervenors.

**DECLARATION OF
SHATIFA SEARLES**

Shatifa Searles, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Shatifa Searles, I am over 18 years of age, and I am fully competent to make this declaration.

2. I was a full-time undergraduate student at UNC-Chapel Hill during the period of 1999 - 2003. While at UNC, my major was anthropology.

3. I am African American.

4. I had many offers from other colleges to participate athletically, but I chose UNC-Chapel Hill because of its academic reputation.

5. UNC-Chapel Hill was the first time I was away from my community, family, social settings, etc. Having other members of my minority present was very important. Unlike most, both of my parents were deceased, so it was rare for family to visit me. It was therefore important for me to interact with those that I could identify with racially/ethnically. As stated above, I was an anthropology major at UNC – Chapel Hill and it was always odd that though I studied and was taught to accept many other cultures, disciplines, religions, etc, mine still felt to be “less than.” It was quite obvious that the main reason for this was African Americans were underrepresented. All my classes studied other races, ethnicities, cultures, but not African Americans. So the thoughts, conclusions, and ideologies around/about African Americans were widely based on stereotypes and falsehoods. I was proud to represent my race not only for other African Americans but for every other student that attended UNC-Chapel Hill. So it is not just about the “black experience” for “black students” but the diverse experience for us ALL.

6. I was told many times by white students that didn’t know my name, let alone my credentials, that their friend was unable to attend because I got in through affirmative action. I was asked often if I was an athlete. During a race class I heard some of the most racist comments from my white classmates that I have ever heard in my life. Among them: “When I see black students I think they are here to play a sport,” “Most black students are here because of affirmative action,” and the best from an Asian student “My dad would be fine with me dating an American but not a black”

7. Yes, it was like a cold war..... being watched, being perceived before one word was spoken, being judged, tried, and sentenced just for showing up.

I declare under penalty of perjury that the foregoing is true and correct. Executed
this 30 day of May, 2017.

Shirley Sealb